

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

AMAZON.COM, INC., a Delaware corporation,

Plaintiff,

No. 2:20-cv-694

V.

COMPLAINT

ROBOJAP TECHNOLOGIES LLC, a Washington limited liability company; SANDEEP SINGH, an individual; QUATIC SOFTWARE SOLUTIONS PVT. LTD., a foreign company; ANUJ SHARMA, an individual; HITESH KUMAR SACHDEVA, an individual; SUKHMEET SINGH BAINS, an individual; and GUREEN PAWAR, an individual,

Defendants.

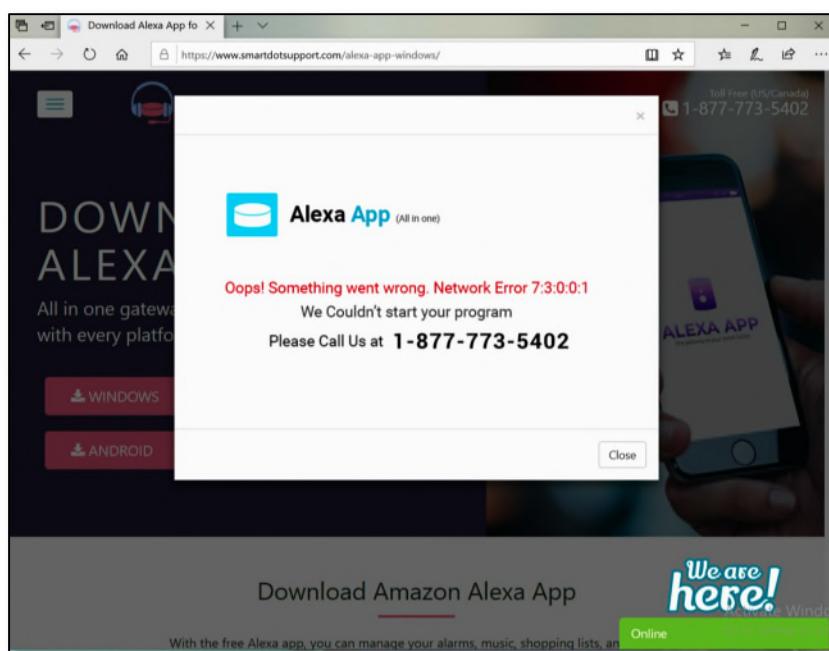
I. INTRODUCTION

1. Amazon.com, Inc. is one of the most well-known and trusted companies in the world. Defendants are a Washington company, Robojap Technologies, LLC (“Robojap”), an Indian company, Quatic Software Solutions Pvt. Ltd. (“Quatic”), and each company’s principals. Together, Defendants exploit Amazon’s brand to perpetrate a widespread tech support fraud that targets users of Amazon’s popular Alexa devices, including Echo and Echo Dot smart speakers. Defendants’ services have no affiliation with Amazon.

2. Defendants' scheme starts with websites and mobile applications that claim to help Amazon's customers setup their Alexa devices. Defendants use Amazon's trademarks, as

1 well as false and misleading statements about Amazon and Defendants' services, to divert
 2 victims from Amazon's genuine activation process and customer support.

3 3. Defendants employ these fraudulent websites and applications in an effort to
 4 deceive victims by purportedly offering a download of Amazon's Alexa app. When victims try
 5 to "download" the Alexa app, however, Defendants present them with an animation that fakes
 6 the download process, ending with an error message that prompts the victim to call Defendants
 7 for assistance. A copy of this fake error message is below:



19 4. When victims call Defendants, the Defendants take remote control of the victim's
 20 computer and, through a variety of deceptive means, attempt to convince the victim that
 21 technical issues exist that prevent their Alexa device from working properly. Those claims are
 22 also entirely false and fraudulent, and no such issues exist. Defendants then offer services to fix
 23 these phony issues, charging customers hundreds of dollars to take the simple steps actually
 24 required to activate an Alexa device that Amazon fully supports through its own customer care.

25 5. Amazon works vigorously to earn and keep its customers' trust, including
 26 protecting customers from bad actors like Defendants. Amazon brings this lawsuit to stop
 27 Defendants' unlawful scheme, and to hold them accountable for the harm they have caused.

II. PARTIES

1 6. Amazon is a Delaware corporation with its principal place of business in Seattle,
 2 Washington. Through its subsidiaries, Amazon owns and operates the Amazon.com website and
 3 equivalent international websites. Amazon also creates and sells a variety of physical devices,
 4 including smart speakers with Amazon's virtual assistant, Alexa.

5 7. Robojap Technologies, LLC is a Washington limited liability company with its
 6 principal office located in Covington, Washington. Robojap's listed office is Defendant Singh's
 7 residence. Robojap is directly liable to Amazon for the damages alleged in this Complaint
 8 because of its direct participation in the alleged activities.

9 8. Sandeep Singh ("Singh") is an individual, who, on information and belief, resides
 10 in Covington, Washington. Singh is Robojap's registered agent, and the company's only
 11 publicly listed member. On information and belief, Singh is directly liable to Amazon for the
 12 damages alleged in this Complaint based on Singh's personal participation in the alleged
 13 activities. Alternatively, Singh had the right and ability to supervise, direct, and control the
 14 wrongful conduct alleged in this Complaint, and derived a direct financial benefit from that
 15 wrongful conduct. As such, Singh is subject to liability for the wrongful conduct alleged herein
 16 under principles of secondary liability.

17 9. Quatic Software Solutions Pvt. Ltd. ("Quatic") is an Indian company with its
 18 principal place of business in India. Quatic is directly liable to Amazon for the damages alleged
 19 in this Complaint because of its participation in the alleged activities.

20 10. Anuj Sharma ("Sharma") is an individual, who, on information and belief, resides
 21 in India. Sharma is a director of Quatic. On information and belief, Sharma is directly liable to
 22 Amazon for the damages alleged in this Complaint based on Sharma's personal participation in
 23 the alleged activities. Alternatively, Sharma had the right and ability to supervise, direct, and
 24 control the wrongful conduct alleged in this Complaint, and derived a direct financial benefit
 25 from that wrongful conduct. As such, Sharma is subject to liability for the wrongful conduct
 26 alleged herein under principles of secondary liability.

1 11. Hitesh Kumar Sachdeva (“Sachdeva”) is an individual, who, on information and
2 belief, resides in India. Sachdeva is a director of Quatic. On information and belief, Sachdeva is
3 directly liable to Amazon for the damages alleged in this Complaint based on Sachdeva’s
4 personal participation in the alleged activities. Alternatively, Sachdeva had the right and ability
5 to supervise, direct, and control the wrongful conduct alleged in this Complaint, and derived a
6 direct financial benefit from that wrongful conduct. As such, Sachdeva is subject to liability for
7 the wrongful conduct alleged herein under principles of secondary liability.

8 12. Sukhmeet Singh Bains (“Bains”) is an individual, who, on information and belief,
9 resides in India. Bains is a director of Quatic. On information and belief, Bains is directly liable
10 to Amazon for the damages alleged in this Complaint based on Bains’s personal participation in
11 the alleged activities. Alternatively, Bains had the right and ability to supervise, direct, and
12 control the wrongful conduct alleged in this Complaint, and derived a direct financial benefit
13 from that wrongful conduct. As such, Bains is subject to liability for the wrongful conduct
14 alleged herein under principles of secondary liability.

15 13. Gureen Pawar (“Pawar”) is an individual who, on information and belief, resides
16 in India. Pawar is a director of Quatic. On information and belief, Pawar is directly liable to
17 Amazon for the damages alleged in this Complaint based on Pawar’s personal participation in
18 the alleged activities. Alternatively, Pawar had the right and ability to supervise, direct, and
19 control the wrongful conduct alleged in this Complaint, and derived a direct financial benefit
20 from that wrongful conduct. As such, Pawar is subject to liability for the wrongful conduct
21 alleged herein under principles of secondary liability.

III. JURISDICTION AND VENUE

23 14. The Court has subject matter jurisdiction over Amazon’s claims for trademark
24 infringement (15 U.S.C. § 1114), violations of Section 43(a) of the Lanham Act (15 U.S.C. §
25 1125(a)), trademark dilution (15 U.S.C. § 1125(c)), and cybersquatting (15 U.S.C. § 1125(d))
26 pursuant to 15 U.S.C. § 1121 and 28 U.S.C. §§ 1331 and 1338(a).

1 15. The Court has personal jurisdiction over Robojap and Singh because they reside
2 in this District. The Court has personal jurisdiction over the other Defendants because they
3 reached out and did business with residents of this District (Robojap and Singh). Further, all
4 Defendants transacted business and committed tortious acts within and directed to this District,
5 and Amazon's claims arise from those activities. On information and belief, Defendants'
6 scheme targeted people in this District, Defendants' websites actively solicit interaction from
7 victims in this District, and Defendants harmed Amazon, which resides in this District.

8 16. Venue is proper in this Court pursuant to 28 U.S.C. § 1391(b) because a
9 substantial part of the events giving rise to the claims occurred in the District, or 28 U.S.C. §
10 1391(c) because at least one defendant resides in this District.

11 17. Pursuant to Local Civil Rule 3(e), intra-district assignment to the Seattle Division
12 is proper because it is the Division where: (a) multiple defendants reside; (b) one defendant has
13 its principal place of business; and (c) a substantial part of the events or omissions that give rise
14 to the claim occurred.

IV. FACTS

A. Amazon and Its Alexa Smart Speakers

18. Amazon is a highly trusted brand. One of Amazon's most popular products is its
19 digital assistant called Alexa, which offers users tens of thousands of skills, including playing
music, making phone calls, and delivering the news.

19. Alexa is built into numerous devices offered by Amazon and by numerous third
20 parties. Many of these products are smart home devices, such as lights, thermostats, door locks,
21 and appliances. Among other things, Alexa allows users to control these smart home devices
22 either through voice control or through other Alexa-enabled devices.
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24 20. Echo, and its smaller sibling, Echo Dot, are popular smart speakers made by
25 Amazon that come with Alexa. The speakers allow users to interact with Alexa and control
26 other Alexa-compatible devices.

1 21. Echo and Echo Dot come with instructions on how to activate the product and
 2 begin using its features. Generally, users must download the Amazon Alexa app, which is
 3 available for iOS and Android devices. The Amazon Alexa app is developed by Amazon and is
 4 available to download for free. Once downloaded, the Amazon Alexa app guides users through
 5 the setup process. There is no fee to activate an Echo or Echo Dot, and no paid subscription is
 6 required.

7 22. Amazon offers robust customer support for Echo and Echo Dot users—free of
 8 charge. Amazon’s website contains instructions, troubleshooting pages, video tutorials, and
 9 answers to common questions. Should a user require additional support, he or she may contact
 10 an Amazon customer service representative by phone or through online chat (among other
 11 methods).

12 23. Amazon exclusively owns numerous U.S. trademark registrations and pending
 13 applications. These trademarks are a critical component of consumers’ ability to readily identify
 14 Amazon products and services—including genuine Alexa-compatible devices and services.

15 24. As alleged in this Complaint, the following trademarks and service marks
 16 (collectively “Amazon Trademarks”) were unlawfully used to further Defendants’ scheme:

<u>Mark</u>	<u>Registration No. (International Classes)</u>
AMAZON	2,657,226 (Int. Cl. 42) 2,738,837 (Int. Cl. 38) 2,738,838 (Int. Cl. 39) 2,832,943 (Int. Cl. 35) 2,857,590 (Int. Cl. 9) 3,868,195 (Int. Cl. 45) 4,171,964 (Int. Cl. 9) 4,533,716 (Int. Cl. 2) 4,656,529 (Int. Cl. 18) 4,907,371 (Int. Cls. 35, 41, 42) 5,102,687 (Int. Cl. 18) 5,281,455 (Int. Cl. 36)
AMAZON.COM	2,078,496 (Int. Cl. 42) 2,167,345 (Int. Cl. 35)

1		2,559,936 (Int. Cl. 35, 36, 42) 2,633,281 (Int. Cl. 38) 2,837,138 (Int. Cl. 35) 2,903,561 (Int. Cls. 18, 28) 3,411,872 (Int. Cl. 36) 4,608,470 (Int. Cl. 45)
5		4,171,965 (Int. Cl. 9) 5,038,752 (Int. Cl. 25)
7		2,684,128 (Int. Cl. 38) 2,696,140 (Int. Cl. 42) 2,789,101 (Int. Cl. 35) 2,884,547 (Int. Cl. 39) 2,970,898 (Int. Cl. 41) 3,414,814 (Int. Cl. 36)
11	ALEXA	5,563,417 (Int. Cls. 9, 35, 36, 39, 41, 42, 43, 44, 45) 5,880,382 (Int. Cls. 9, 37, 41, 42) 2,181,470 (Int. Cl. 42) 2,189,928 (Int. Cl. 9)
15	ECHO	5,470,187 (Int. Cls. 9, 42) 5,469,992 (Int. Cls. 9, 38, 41, 42)
17		5,413,055 (Int. Cls. 35, 36, 39, 41, 43, 44, 45) 5,682,947 (Int. Cls. 9, 42)

25. The Amazon Trademarks have been used exclusively and continuously by Amazon, and have never been abandoned. The above U.S. registrations for the Amazon Trademarks are valid, subsisting, in full force and effect, and many are incontestable pursuant to 15 U.S.C. § 1065. The registrations for the Amazon Trademarks constitute prima facie evidence of their validity and of Amazon's exclusive right to use the Amazon Trademarks pursuant to 15 U.S.C. § 1057(b).

1 **B. Tech Support Scams**

2 26. Tech support scams victimize hundreds of thousands of people every year.¹

3 These schemes disproportionately affects vulnerable populations, such as the elderly.

4 27. Bad actors target victims through a variety of means, including online
5 advertisements that render pop-ups, paid search results, websites, and mobile applications. The
6 purpose of each is to prompt victims to call a toll-free number that connects them to the bad
7 actors.

8 28. Once connected, the bad actors typically gain remote access to victims'
9 computers. With the remote access, the bad actors deceive victims into believing their devices
10 have dangerous technical issues, such as being infected with malicious viruses, in order to sell
11 unneeded services to solve the nonexistent issues.

12 29. Traditionally, tech support schemes have focused on vulnerabilities in a
13 computer's operating system or other software as the material misrepresentations made to
14 victims in order to sell fraudulent services.

15 30. Given the rise of connected devices beyond traditional computers—such as Alexa
16 devices—bad actors now target potential victims seeking assistance with these devices. Among
17 other things, the bad actors seek to divert victims from contacting the genuine customer support
18 numbers and instead cause unsuspecting victims to pay the bad actors for unnecessary services to
19 perform basic tasks like connecting the devices. During this process, the bad actors make a
20 variety of false statements about the device, its security, and the genuine company.

21 **C. Defendants Deceive People Into Purchasing Unnecessary Tech Support
22 Services for Amazon Alexa Devices**

23 31. Defendants run an international tech support fraud scheme with operations in the
24 U.S. and India. Defendants recruit victims through multiple websites and mobile applications
25 that purport to offer genuine services to help users connect Amazon Alexa devices. Defendants
26 use these websites and applications to divert victims from Amazon's genuine website and Alexa

27 ¹ <https://www.consumer.ftc.gov/blog/2019/03/ftcs-tech-support-takedown-2019>.

1 app, and then to deceive victims into believing an issue exists with their Alexa device—when no
2 such issue exists. Defendants then prey on these victims to sell them “services” for hundreds of
3 dollars in order to “fix” the issue. Defendants’ services are unnecessary and harm innocent
4 victims.

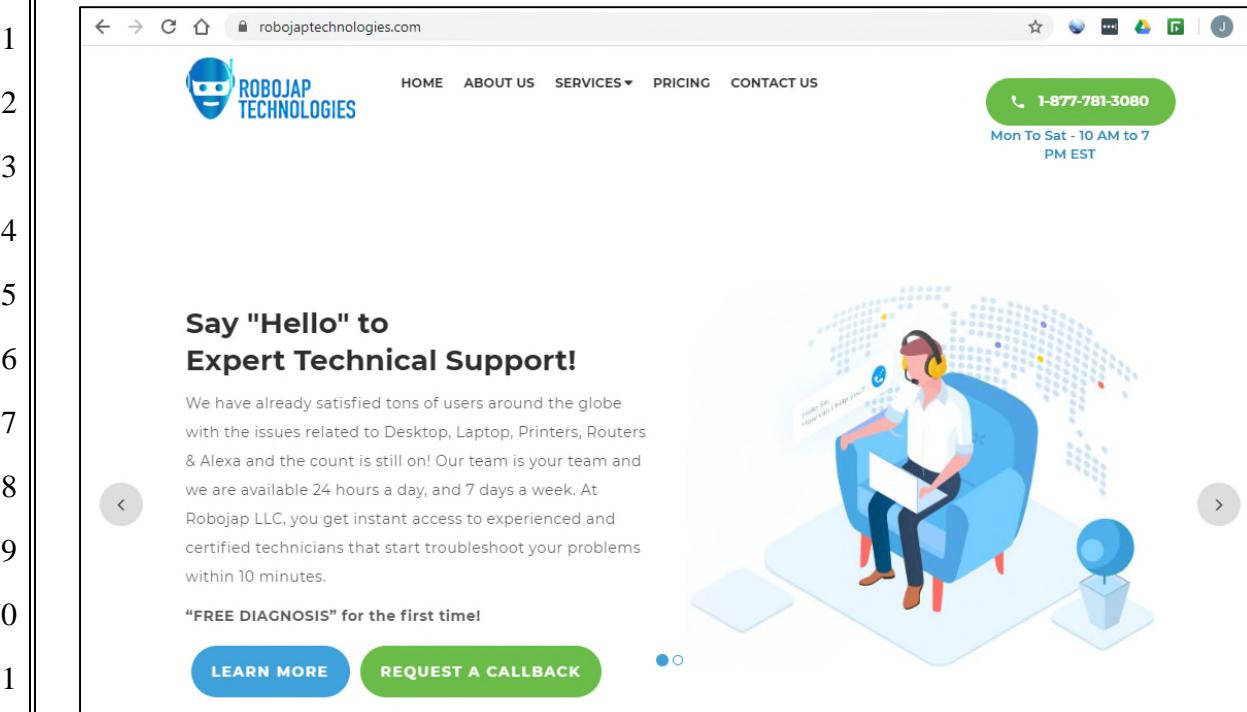
5 **1. Robojap and Quatic**

6 32. Defendant Singh owns and operates Robojap, which lists its business address as
7 Singh’s residence in Covington, Washington.

8 33. Robojap operates the website robojaptechnologies.com. The website represents
9 that Robojap provides technical support services, and that they specialize in “smart home
10 technical support.” Among other things, the company states that it “is the only company that
11 focused solely on 24/7 management and backend support of smart home devices.” The company
12 also makes numerous representations about the scale of their support operation (e.g., “over 3.5
13 million issues resolved”), which, on information and belief, are false. A partial screenshot of this
14 website is below

15 *[Image on the following page]*

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34. Quatic's operation is located in Punjab, India. Quatic is owned by four individuals: Defendants Sharma, Sachdeva, Pawar, and Bains. Quatic operates a website at quaticsoft.com, which Defendants registered through Namecheap, Inc. on March 22, 2017. The website describes Quatic as providing web design, digital marketing, and tech support services for a smart automation system.

35. Quatic operates a second website at the domain quatic-software-solutions.business.site. The website was built using Google's free website builder. One of Quatic's directors, Defendant Sachdeva, goes by the name "Happy." Posts on the website quatic-software-solutions.business.site were made by "happy sachdeva."

36. Quatic's website also states that "Quatic Software solution Pvt. Ltd. is managed by US based Robojap technologies LLC Seattle WA, USA." A screenshot of this statement is below:

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ABOUT QUATIC SOFTWARE SOLUTION PVT. LTD

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Quatic software solutions is an IT based company provides complete IT solutions to our clients across the world. We provide quick solutions for every type of businesses. Quatic software solutions currently working on many US based projects. Quatic Software solution Pvt. Ltd is managed by US based Robojap technologies LLC Seattle WA, USA. Our services and solutions run the entire range of what a modern business could possibly need within the IT spectrum.

37. The individual Defendants share social media connections. For example, Defendant Singh is Facebook friends with Sachdeva and Pawar.

38. On information and belief, Defendants employ between 15 and 20 people to work in their call center in India. Defendants operate night shifts in India, which is daytime in the United States, in order to better target victims in the United States.

39. Victims have lodged numerous public complaints against Robojap for tech support fraud. For example, Robojap has an “F” rating from the Better Business Bureau, which received a number of complaints against the company, including for fraudulent tech support services involving Alexa devices. As another example, a complaint on scampulse.com starts “I feel I was misrepresented by your company. I believed I was communicating with someone from Amazon with reference to help in setting up my Alexa.”²

40. Amazon has also received a number of complaints about Robojap misleading victims into believing they are affiliated with Amazon, and selling them unwanted services.

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2. Defendants Target Victims Seeking Help with Amazon Alexa Devices

41. Defendants use both websites and mobile applications to deceive victims into contacting their call centers. Among other tactics, Defendants use the Amazon Trademarks and false statements about their affiliation with Amazon. Defendants also use a phony download process to trick people into believing an issue exists with the Alexa app—when no issue exists.

² <https://www.scampulse.com/robojap-technologies-llc-reviews>.

a. Defendants Use Websites to Target Victims

42. Defendants registered Robojaptechnologies.com with the registrar Namecheap, Inc. on May 26, 2016—the same day Robojap was formed. The Defendants host the website with Namecheap through IP address 198.54.123.190. Over twenty other domains are hosted through this IP address, and on information and belief, Defendants also control these domains.

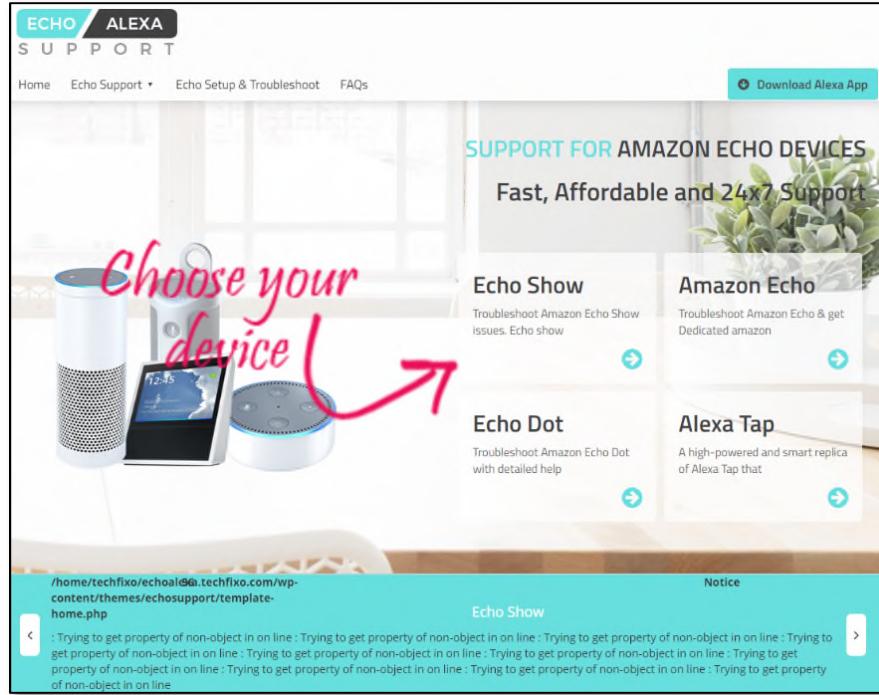
43. A number of the other domains hosted through Defendants' account at Namecheap are websites that purport to offer tech support services for Alexa devices and smart speakers, such as hometosmarthome.com, [smartspeakersskills.net](http://smartspeakerskills.net), smartvoicedevices.com, thesmartspeakerapp.com, thesmartspeakersetup.com, smartskillapp.com, smartspeakersskills.net, and techfixo.com.³

44. Defendants also registered and use domains that contain the Amazon Trademarks. Defendants have a core domain that uses the Amazon Trademarks (echoalexaskill.com), and three subdomains that use the Amazon Trademarks (echoalexa.techfixo.com, echoshow.techfixo.com, alexa-app.cloudtechnologiesllc.us). Screenshots of the homepages of the first three aforementioned websites are attached as Exhibits A – C.

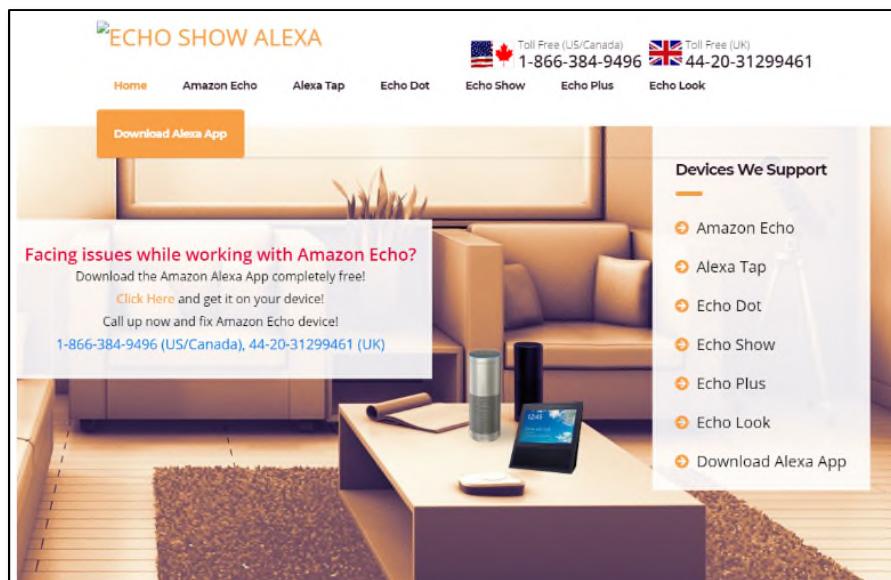
45. The website echoalexa.techfixo.com uses Amazon's brand to advertise tech support services targeting Alexa users. A screenshot of the website is below:

[Image on the following page]

³ Other websites on Defendants' Namecheap account appear to offer non-Alexa targeted tech support services, such as wwwcomputerhelp.com.



46. The website echoshow.techfixo.com also uses Amazon's brand to advertise tech support services targeting Alexa users. A screenshot of the website is below:



47. Another website hosted through Defendants' account at Namecheap is Quatic's website (quaticsoft.com).

1 48. One of Defendant Sachdeva's email addresses, happy_sachdeva@yahoo.com, is
2 connected through public sources with the website thesmartspeakerapp.com, which is also hosted
3 through Defendants' Namecheap account.

b. Defendants Use Apps to Target Victims

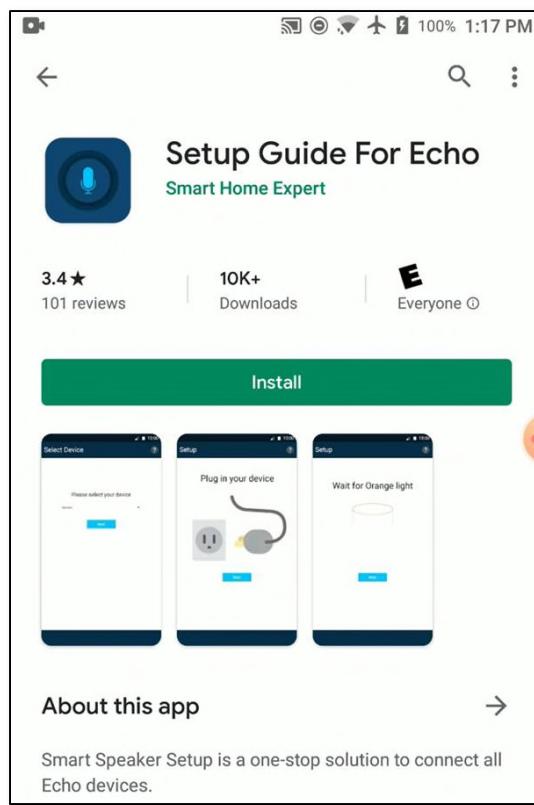
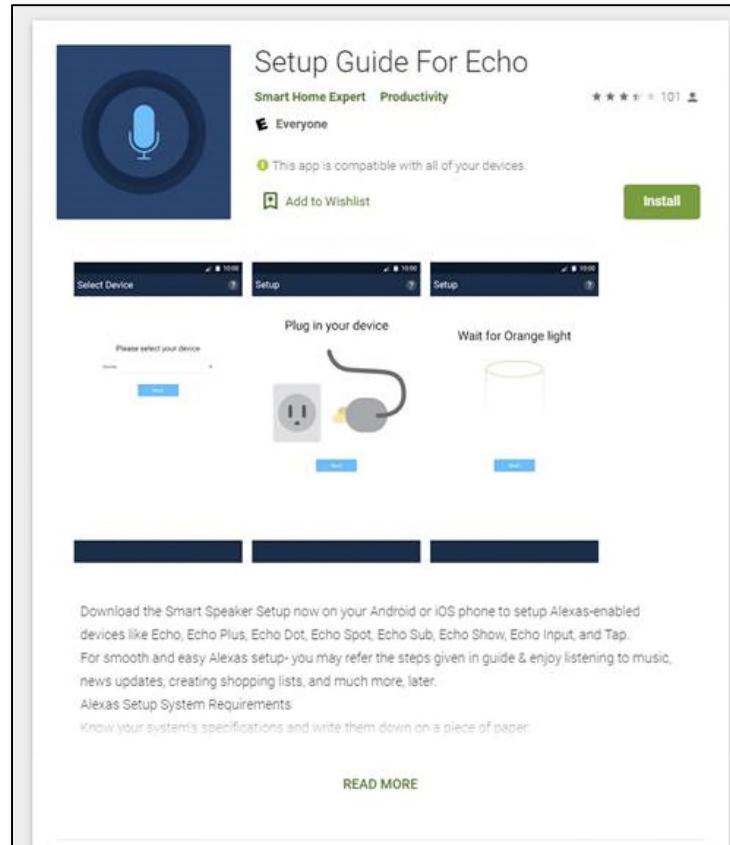
5 49. In addition to the websites Defendants operate, they also design and distribute
6 mobile apps that use Amazon's brand to deceive victims attempting to activate Echo devices.

7 50. Defendants distribute multiple apps on the Google Play store using the developer
8 name “Smart Home Expert.” One email address connected to Defendants’ account with Google
9 is quaticsoft@gmail.com. The name on the account for this email is “Hitesh Kumar,” which is a
10 variation of Defendant Sachdeva’s name. Another email address used by “Smart Home Expert”
11 is support@smartvoicedevices.com, which uses a domain hosted by Defendants’ account at
12 Namecheap (the same account that hosts websites like robojaptechnologies.com).

13 51. Through their “Smart Home Expert” account with Google, Defendants distributed
14 the apps “Setup Guide for Echo” and “Echo Setup Instructions & Guide.”

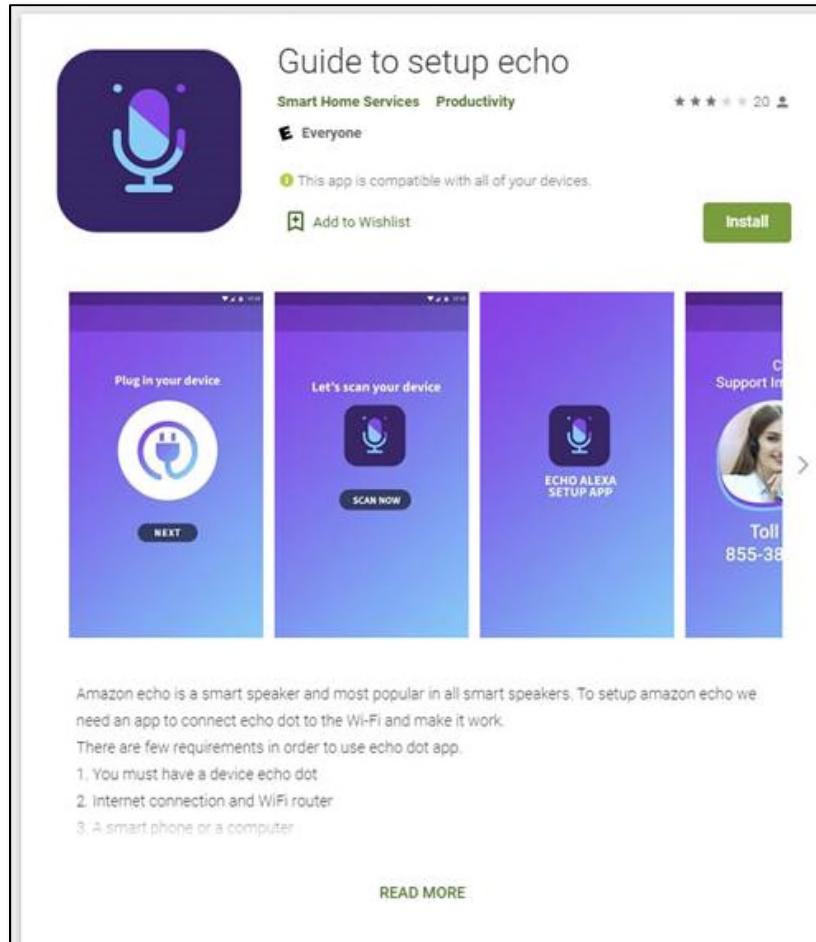
15 52. In the description for Defendants' app "Setup Guide for Echo," Defendants state:
16 "Download the Smart Speaker Setup now on your Android or iOS phone to setup Alexa-enabled
17 devices like Echo, Echo Plus, Echo Dot, Echo Spot, Echo Sub, Echo Show, Echo Input, and
18 Tap." Defendants also described the app a "one-stop solution to connect all Echo devices."
19 Partial screenshots of these pages are below:

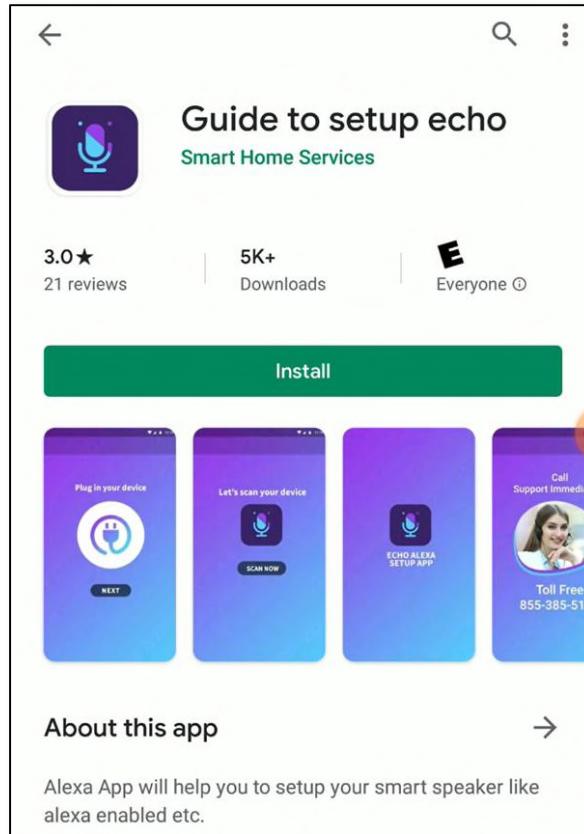
[Images on the following page]



1 53. Defendants also use the developer name “Smart Home Services” to distribute
 2 apps on the Google Play store. The email address used on the account is
 3 appleads304@gmail.com. This email account was accessed from IP addresses 122.173.63.111
 4 and 112.196.109.2 (among others), which were both used to access the account
 5 quaticsoft@gmail.com. Both appleads304@gmail.com and quaticsoft@gmail.com used the
 6 same phone number “918708191152,” which public records connect to Defendant Sachdeva.

7 54. One of the apps Defendants distributed using the name “Smart Home Services”
 8 was “Guide to setup echo.” Among other things, the app purported to “help you setup your
 9 smart speaker like alexa enabled, etc.” Partial screenshots of the description pages for this app
 10 are below:





55. None of Defendants' apps were approved by or affiliated with Amazon, and they had no right to use Amazon's brand to market their services.

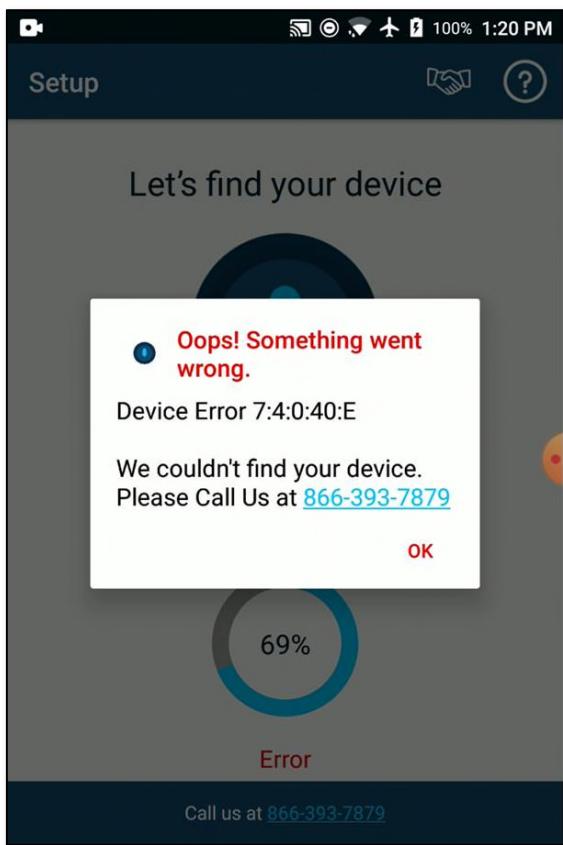
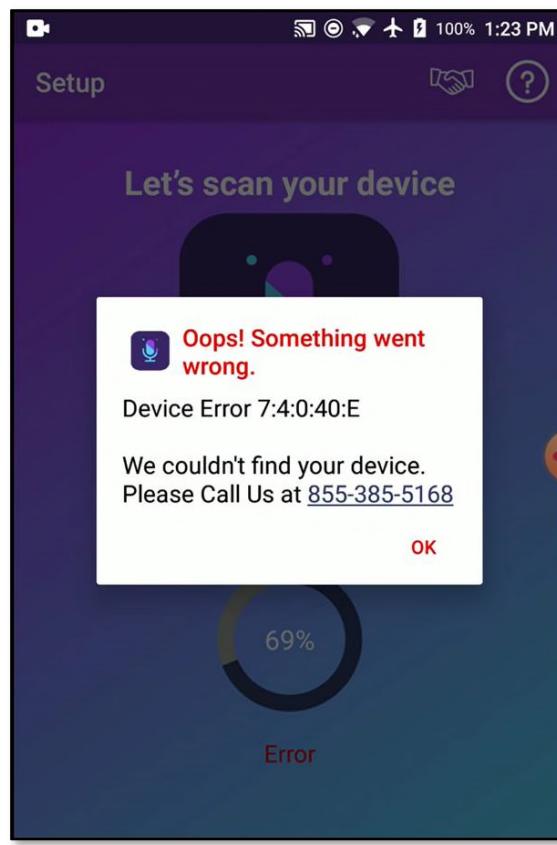
56. **c. Defendants' Websites and Apps Falsely Tell Victims an Error Occurred with their Alexa Device**

57. The purpose of Defendants' websites and apps is to cause victims to contact Defendants' call center, which allows Defendants to sell victims unnecessary services.

58. Defendants prompt victims to call them by displaying phony error messages that claim an error occurred with the victim's Alexa device.

59. For example, Defendants' apps "Setup Guide for Echo" and "Guide to setup echo" both purportedly assist victims with setting up their Alexa devices. However, when victims attempt to use the apps to setup their devices, they are presented with an error code. Partial screenshots of the error message from both apps are below:

60. *[Images on the following page]*

Setup Guide for EchoGuide to setup echo

59. Despite Defendants' representations to the contrary, these apps do not have the
 60. functionality to setup an Alexa device. Although the app states it is "find[ing] your device," the
 61. apps are not "finding" Alexa devices. The error code will always display as it results from an
 62. animation Defendants use in the app. Defendants designed the apps to show this message each
 63. time a victim attempts to use them.

64. Like the apps, Defendants' websites use a similar tactic to deceive users into
 65. contacting Defendants' call center. For example, Defendants operate the websites
 66. echoalex.techfixo.com and echoshow.techfixo.com. Both websites contain a link where victims
 67. can download the "Alexa App," as shown in the following screenshots:

68. *[Images on the following page]*

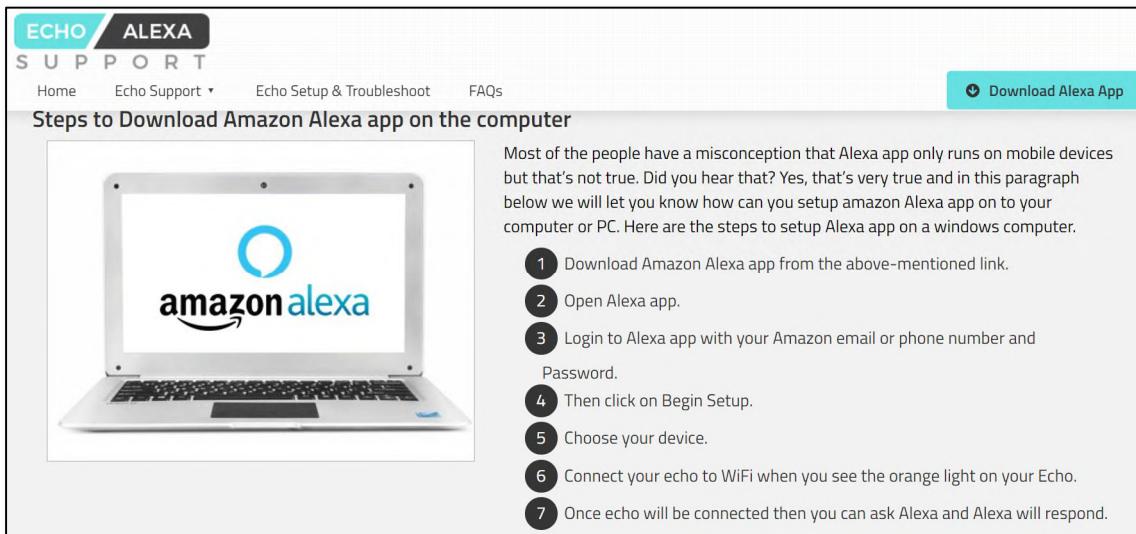
echoalexa.techfixo.com



echoshow.techfixo.com



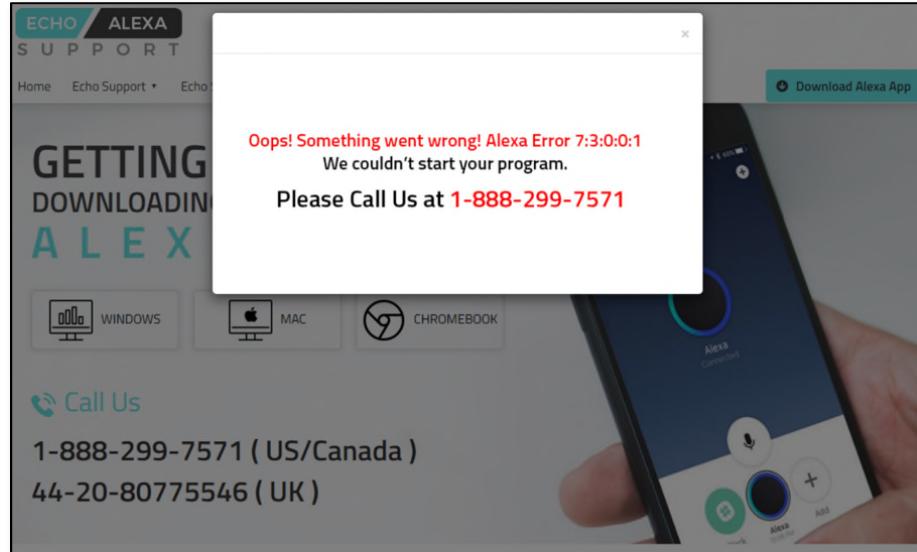
61. Defendants falsely represent to victims that they are offering the genuine Amazon Alexa app, including using Amazon’s trademarks to further the deception. For example, on the website echoshow.techfixo.com, Defendants refer to themselves as the “Amazon Alexa App support team” and claim victims can download the “Alexa app.” As another example, below is a partial screenshot from the page victims see when they click “Download Alexa App” on echoalexa.techfixo.com, including a header stating “Steps to download Amazon Alexa app”:



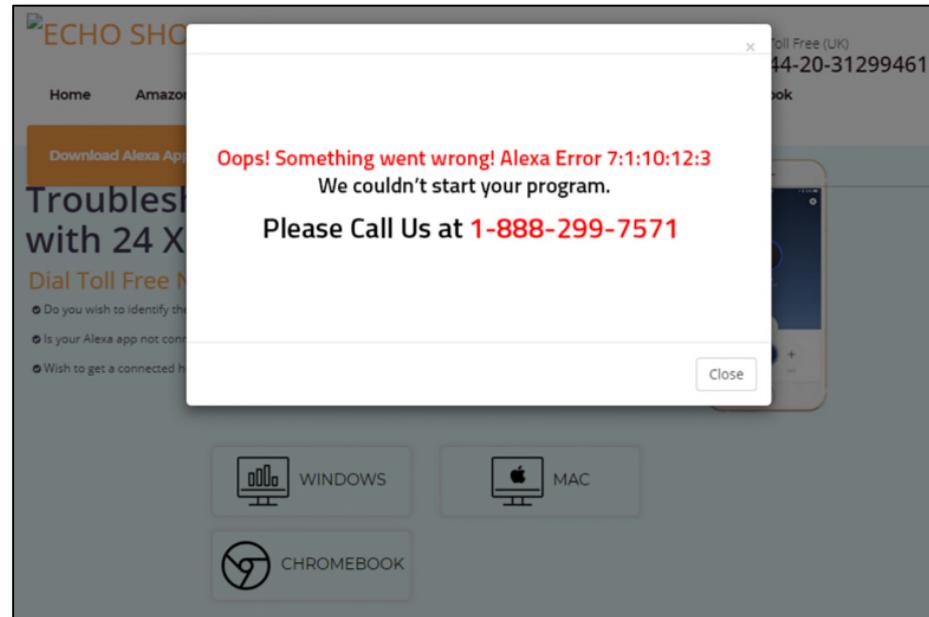
62. When a victim attempts to download the “Alexa app” from Defendants’ websites, victims see an animation on the website that is designed to appear like the app is downloading. No actual download occurs. Instead, after a few seconds, the animation results in an error

1 message similar to the ones presented through Defendants' apps. Partial screenshots of these
 2 error messages are below:

3 echoalexa.techfixo.com



13 echoshow.techfixo.com



24 63. Defendants' misrepresentations are particularly harmful because they are
 25 designed to appear like Amazon's genuine setup process for Alexa devices. To setup a device,
 26 users download Amazon's Alexa app, and follow the setup instructions. Defendants target
 27

1 victims by diverting them from Amazon's genuine app to websites and apps from which victims
 2 cannot actually install Alexa devices.

3 **3. Defendants' Sale of Fraudulent Tech Support Services**

4 64. The purpose of Defendants' websites and apps is to deceive victims into calling
 5 the Defendants' toll-free number. Once victims call the number, Defendants continue to falsely
 6 claim that there is an issue with the victims' Alexa device, and attempt to sell victims
 7 unnecessary services. An investigator working for Amazon contacted Defendants and was twice
 8 sold unnecessary services after being falsely told issues existed with his Echo Dot. Despite
 9 Defendant's extensive use of the Amazon Trademarks and false or misleading statements about
 10 Defendants' connection to Amazon, Defendants' services do not originate with, are not
 11 sponsored or approved by, and are not otherwise affiliated with, Amazon.

12 **a. First Test Purchase**

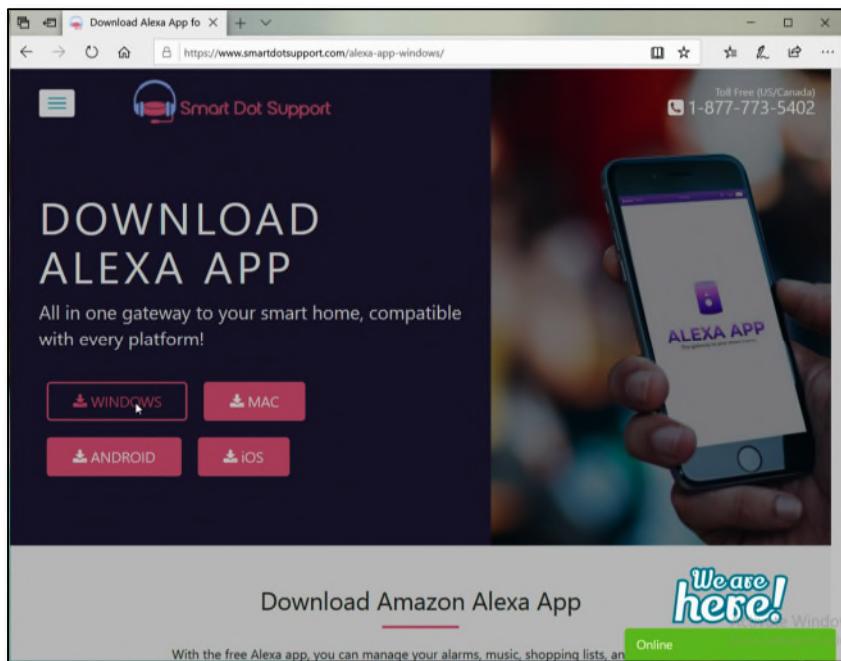
13 65. On December 10, 2019, an investigator initiated an online chat on Defendants'
 14 website, robojaptechnologies.com. The investigator requested help with his Echo Dot, and told
 15 Defendants it was simply "not working."

16 66. One of Defendants' agents responded by directing the investigator to a remote
 17 access service via fastsupport.gotoassist.com/811201526. The service is operated by a U.S.
 18 company called LogMeIn, Inc. The technician used the name "Victor Jones" to connect to the
 19 investigator's computer.

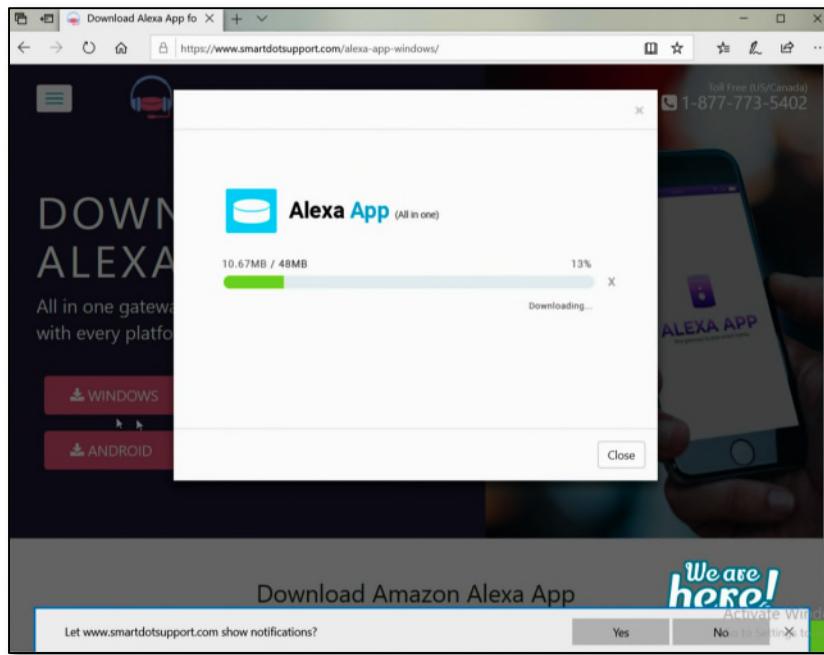
20 67. The technician asked for the investigator's name and number, and then called the
 21 investigator from 888-440-5666 (which public records indicates is controlled by a U.S company
 22 named ThinQ, Inc.). On the phone call, the technician instructed the investigator to connect the
 23 Alexa Dot to a power outlet. The technician then said, "I am going to download Alexa app onto
 24 your computer in order to set it up."

25 68. The technician navigated to the website [smartdotsupport.com/alexapp-](http://smartdotsupport.com/alexapp-windows/)
 26 windows/. This website is hosted through Defendants' account at Namecheap (which hosts
 27 websites like robojaptechnologies.com). Defendant Sachdeva's email address,

1 hitesh@quaticsoft.com, is also connected through public sources to this website. Below is a
 2 partial screenshot of the website's homepage:

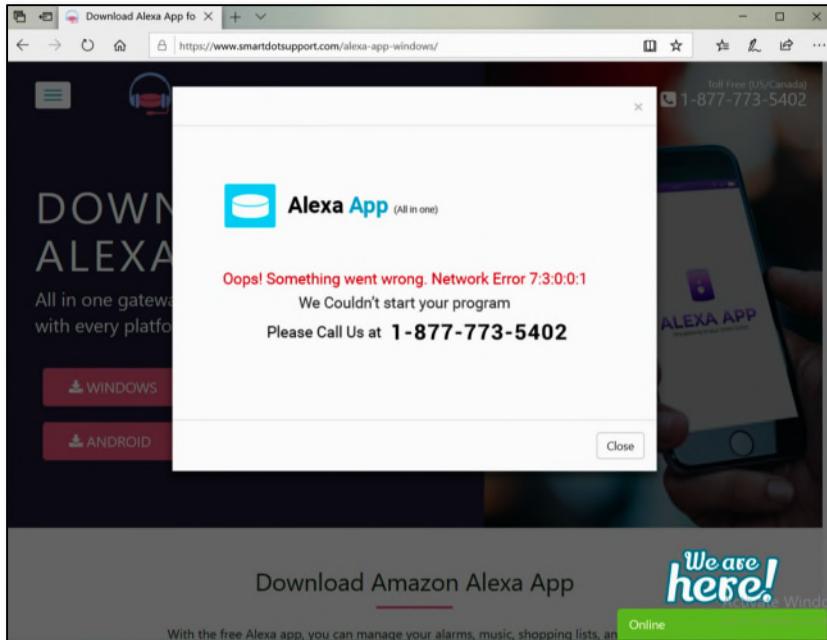


14 69. The technician clicked on the Windows download button, which caused a window
 15 to pop-up that purportedly indicated a download was in progress. A screenshot of this download
 16 image is below:



1 70. The website does not download anything. The screen just presents an animation
 2 to deceive the victim into believing the Alexa app is downloading.

3 71. After a few seconds, the animation ends in an error message, a screenshot of
 4 which is below:



5 72. After presenting the investigator with the phony error message above, the
 6 technician represented there was a security problem with the computer. The technician opened
 7 the command function, and prompted a simple directory search. The perpetrator stated this task
 8 would identify the problem. At the conclusion of the search, the perpetrator wrote at the bottom
 9 of the dialogue box: "Foreign Address Detected . . . IP is not secure . . . Unable to connect
 10 Alexa." A screenshot of this message is below:

```
21 09/14/2018 11:28 PM      8,124 eeprom_ar6320_3p0_NFA364xp_RV_0519.bin
22 09/14/2018 11:28 PM      8,124 eeprom_ar6320_3p0_NFA364xp_RV_0520.bin
23 09/14/2018 11:28 PM      8,124 eeprom_ar6320_3p0_NFA364xp_ssru.bin
24 09/14/2018 11:28 PM      8,124 eeprom_ar6320_3p0_NFA364xp_ssru_DE_0522.bin
25 09/14/2018 11:28 PM      8,124 eeprom_ar6320_3p0_NFA364xp_ssru_DE_0523.bin
26 09/14/2018 11:28 PM      8,124 eeprom_ar6320_3p0_NFA364xp_ssru_DE_0524.bin
27 09/14/2018 11:28 PM      8,124 eeprom_ar6320_3p0_NFA364xp_ssru_RV_0519.bin
28 09/14/2018 11:28 PM      8,124 eeprom_ar6320_3p0_QCA9008.bin
29 09/14/2018 11:28 PM      8,124 eeprom_ar6320_3p0_SS_620.bin
30 09/14/2018 11:28 PM      8,124 eeprom_ar6320_3p0_SS_620_K.bin
31
32 C:\>Foreign Address Detected...IP is not secure...Unable to connect Alexa
```

1 73. Defendants' representations were false. The command function they used could
 2 not identify any problem with the investigator's Alexa device. Further, no issues existed with
 3 the investigator's Alexa device, and no issue prevented the device from being connected.

4 74. After telling the investigator there was an issue with his device, the technician
 5 offered to sell the investigator a protection plan that would solve the issue. When the
 6 investigator hesitated to purchase the services, the technician disconnected the call.

7 75. Ten minutes later, the investigator called the technician back at 888-440-5666. A
 8 different technician answered and identified himself as "Max." The investigator stated that
 9 Victor had offered services for \$150, and he wanted to purchase them.

10 76. The technician reconnected to the investigator's computer through LogMeIn.
 11 After connecting, the technician navigated to quickclick.com to process the payment for the
 12 transaction. Quickclick.com is hosted through 104.192.33.48, which is a dedicated server
 13 connected to Gateway Processing Services—a U.S.-based payment processor.

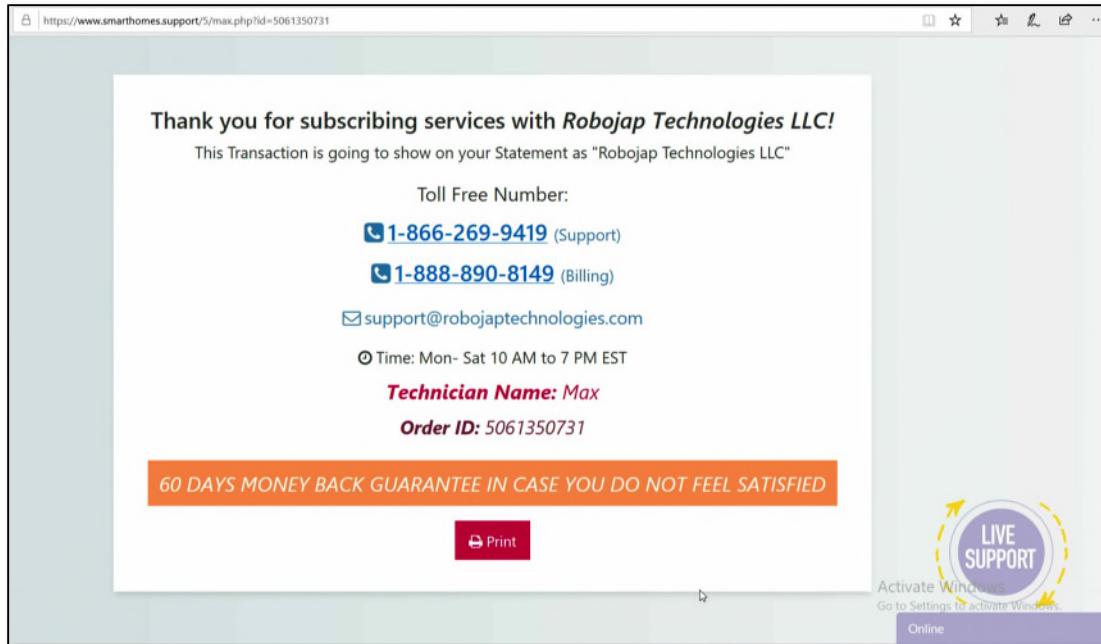
14 77. The investigator provided his payment information to Defendants in order to
 15 purchase services for \$150 that were supposed to protect his devices and solve the Alexa-device
 16 issue identified by the technician.

17 78. The investigator received a confirmation email from
 18 support@robojaptechnologies.com. The receipt listed the merchant as Robojap Technologies,
 19 LLC.

20 79. After the purchase was completed, the payment website (quickclick.com)
 21 redirected to the website smarthomes.support. This website stated: "Thank you for subscribing
 22 services with Robojap Technologies, LLC." A partial screenshot of this website is below:

23 *[Image on the following page]*

24
 25
 26
 27



80. Smarthomes.support was registered with Namecheap on November 23, 2017, and
 11 is hosted through Defendants' account at Namecheap. Publicly available information associates
 12 one of Defendant Sachdeva's email addresses (happy_sachdeva@yahoo.com) with the website.
 13 Based on public records, the phone numbers listed on the website are owned by Telengy, LLC,
 14 which is a U.S.-based company.

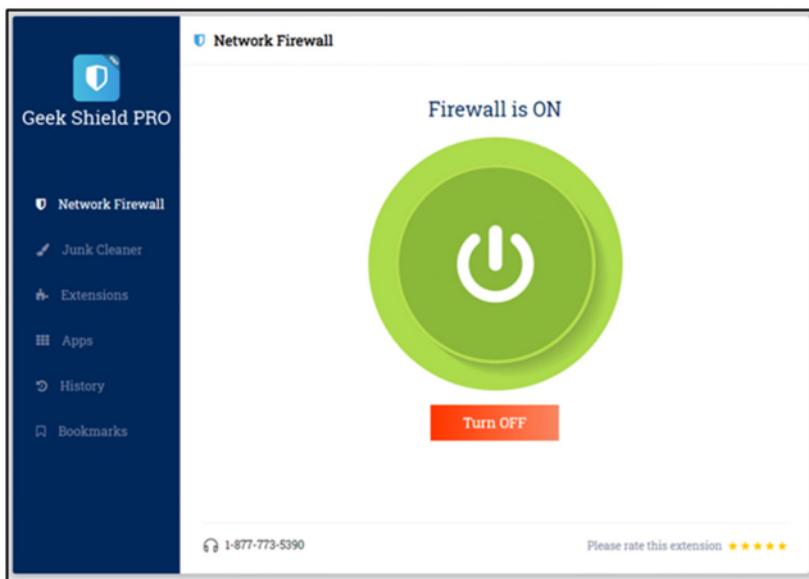
81. The technician then helped the investigator execute an agreement with Robojap
 17 Technologies. First, the technician created a Gmail account for the investigator. Second, the
 18 technician transferred the investigator back to Victor by going to another remote access link at
 19 fastsupport.gotoassist.com/598865832. The technician then disconnected the call. A few
 20 minutes later, the investigator received a call from 866-269-9419, from a different person who
 21 identified himself as "Victor" of "the support team."

82. The technician then opened an email from DocuSign (a U.S. company) that
 23 contained a contract with the perpetrators. The subject of the email was "Please DocuSign: \$
 24 contract for Robojap technologies llc.docx." The DocuSign agreement used the email address
 25 agreemntsofcloudtechnologies@gmail.com.⁴ The technician scrolled through the agreement,
 26

27 ⁴ A website for cloudtechnologiesllc.com is hosted through Defendants' Namecheap account.

1 entered values, and signed for the investigator. The investigator received the completed
 2 agreement via email. The title of the agreement is “Robojap Technologies LLC, User Service
 3 Agreement.”

4 83. After the agreement was completed, the technician installed a Chrome extension
 5 called Geek Shield Pro. Among other things, this extension falsely purports to provide a
 6 firewall. In the firewall section of the extension, an animation shows that the firewall is off. The
 7 animation then shows a loading power button that turns green and then states the firewall is on.
 8 The extension does not create a firewall. A screenshot of this button is below:



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 84. The developer page on the Google Play store for this app lists the contact address
 as support@geekshields.com. The domain used for this email address is hosted through
 Defendants' account at Namecheap.

85. After the installation of the phony firewall, the technician created a genuine Alexa
 account for the investigator, and connected the investigator's Echo Dot. Nothing prevented the
 technician from taking these steps when the investigator first contacted Defendants and before
 selling the investigator unnecessary services.

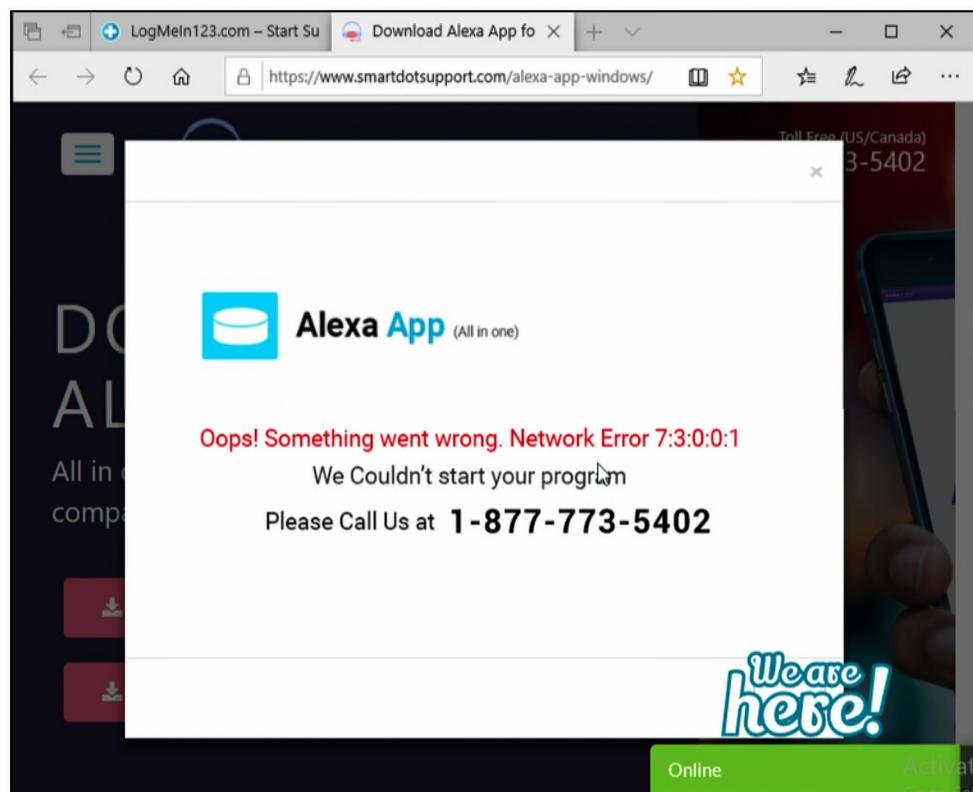
b. Second Test Purchase

86. On December 16, 2019, the investigator called Robojap at 877-781-3080, the number listed on Robojap's website. Defendants' agent, a person who later identified himself as "Harold," answered the call. The investigator asked for help setting up an Amazon Alexa device.

87. The technician requested remote access to the investigator's computer through LogMeIn. Once the technician gained access, he took the investigator to the same website as in the first test purchase, smartdotsupport.com.

88. The technician walked the investigator through the same exercise as the first purchase, including attempting to “download” the Alexa app through the website. As with the first test purchase, no actual program downloaded. The screen shown to the investigator was merely an animation to deceive victims into believing the technician is attempting a download.

89. After a few seconds, the website stated that there was an error in the download process, a partial screenshot of which is below:



1 90. With this error message on the screen, the technician told the investigator that the
 2 computer lacked the proper “protections,” and that “bad things” were happening on the
 3 investigator’s device.

4 91. The technician opened a program on the investigator’s computer called Notepad
 5 and wrote: “Alexa failed to download,” the investigator had “unsecure devices,” and the
 6 investigator’s “[n]etwork access protection is out of date please install and renew.” These
 7 statements are false. A screenshot of this message is below:

```

8 Untitled - Notepad
9 File Edit Format View Help
10 Alexa failed to download
11
12 network error 73001
13
14 unsecure devices ( all are connected with same wifi )
15
16 Network access protection is out of date please install and renew |
17
18
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```

17 92. The technician offered to sell the investigator certain “lifetime” services for \$150
 18 to fix these issues. A screenshot of this offer, as written by the technician, is below:

```

19 Untitled - Notepad
20 File Edit Format View Help
21
22 2 years all protection + service + support :- 99
23
24
25
26
27

```

1 93. During the purchase, the technician provided a contact phone number of 866-269-
2 9419 for the investigator to call back. This was the same number Defendants used in the first
3 test purchase.

4 94. When the investigator agreed to purchase the services, the technician took the
5 investigator to quickclick.com to complete the transaction—the same website used in the first
6 test purchase. The first attempt at charging the card failed. The perpetrator hung up while the
7 investigator “called the bank,” but then called back from 888-440-5666—a number also used in
8 the first test purchase. Defendants again tried to run the investigator’s payment card, but it did
9 not go through.

V. CAUSES OF ACTION

FIRST CAUSE OF ACTION

Trademark Infringement (15 U.S.C. § 1114)

13 95. Amazon incorporates by reference the factual allegations contained in Sections I–
14 IV as though set forth herein.

96. Defendants' activities infringe the Amazon Trademarks.

16 97. Amazon advertises, markets, and distributes its products and services using the
17 Amazon Trademarks, and uses these trademarks to distinguish its products and services from the
18 products and services of others in the same or related fields.

19 98. Because of Amazon's long, continuous, and exclusive use of the Amazon
20 Trademarks, they have come to mean, and are understood by customers, users, and the public to
21 signify, products and services from Amazon.

22 99. Defendants' websites use the Amazon Trademarks in commerce in a manner that
23 is intended to cause confusion, mistake, or deception as to source, origin, or authenticity of
24 Defendants' website.

25 100. Further, Defendants' activities are likely to lead the public to conclude,
26 incorrectly, that Defendants' websites and product offerings originate with or are authorized by

1 Amazon, thereby harming Amazon and innocent victims.

2 101. At a minimum, Defendants acted with willful blindness to, or in reckless
3 disregard of, their lack of authority to use the Amazon Trademarks and the confusion that the use
4 of those trademarks had on consumers as to the source, sponsorship, affiliation, or approval by
5 Amazon of Defendants' websites and products.

6 102. Defendants are subject to liability, jointly and severally, for the wrongful conduct
7 alleged herein, both directly and under various principles of secondary liability, including
8 without limitation, respondeat superior, vicarious liability, and/or contributory infringement.

9 103. As a result of Defendants' wrongful conduct, Amazon is entitled to recover its
10 actual damages, Defendants' profits attributable to the infringement, and treble damages and
11 attorney fees pursuant to 15 U.S.C. § 1117(a)–(b). The amount of money due from Defendants
12 to Amazon is unknown to Amazon and cannot be ascertained without a detailed accounting by
13 Defendants. Alternatively, Amazon is entitled to statutory damages under 15 U.S.C. § 1117(c).

14 104. Amazon is further entitled to injunctive relief, as set forth in the Prayer for Relief
15 below. Amazon has no adequate remedy at law for Defendants' wrongful conduct because,
16 among other things: (a) the Amazon Trademarks are unique and valuable property; (b) in
17 addition to the significant harm that Defendants have caused to innocent customers, Defendants'
18 infringement constitutes harm to Amazon's reputation and goodwill such that Amazon could not
19 be made whole by any monetary award; (c) if Defendants' wrongful conduct is allowed to
20 continue, the public is likely to become further confused, mistaken, or deceived as to the source,
21 origin, or authenticity of the infringing websites; and (d) Defendants' wrongful conduct, and the
22 resulting harm to Amazon, is continuing.

SECOND CAUSE OF ACTION

False Designation of Origin, Sponsorship, Approval, or Association and False Advertising (15 U.S.C. § 1125(a))

105. Amazon incorporates by reference the factual allegations contained in Sections I–IV as though set forth herein.

1 106. Amazon advertises, markets, and distributes its products and services using the
 2 Amazon Trademarks, and it uses these trademarks to distinguish its products and services from
 3 the products and services of others in the same or related fields.

4 107. Because of Amazon's long, continuous, and exclusive use of the Amazon
 5 Trademarks, they have come to mean, and are understood by customers, end users, and the
 6 public to signify products and services from Amazon.

7 108. Amazon has also designed distinctive and aesthetically pleasing displays, logos,
 8 icons, and graphic images (collectively, "Amazon designs") for its websites.

9 109. Defendants' wrongful conduct includes the use of the Amazon Trademarks,
 10 Amazon's name, and/or imitation designs (specifically displays, logos, icons, and/or graphic
 11 designs virtually indistinguishable from the Amazon designs), and false statements regarding
 12 Amazon and its products or services in connection with Defendants' commercial advertising or
 13 promotion.

14 110. Defendants have used, and continue to use, the Amazon Trademarks, Amazon's
 15 name, and/or imitation designs to deceive customers. On information and belief, Defendants'
 16 wrongful conduct misleads and confuses their users and the public as to the origin and
 17 authenticity of the goods and services advertised, marketed, offered or distributed in connection
 18 with Amazon's trademarks, name, and imitation visual designs, and wrongfully trades upon
 19 Amazon's goodwill and business reputation.

20 111. Defendants' acts constitute willful false statements in connection with goods
 21 and/or services distributed in interstate commerce, in violation of 15 U.S.C. § 1125(a).

22 112. Defendants are subject to liability for the wrongful conduct alleged herein, both
 23 directly and under various principles of secondary liability, including without limitation,
 24 respondeat superior, vicarious liability, and/or contributory infringement.

25 113. Amazon is further entitled to injunctive relief, as set forth in the Prayer for Relief
 26 below. Defendants' acts have caused irreparable injury to Amazon. The injury to Amazon is
 27 and continues to be ongoing and irreparable. An award of monetary damages cannot fully

1 | compensate Amazon for its injuries, and Amazon lacks an adequate remedy at law.

2 114. As a result of Defendants' wrongful conduct, Amazon is entitled to recover its
3 actual damages, Defendants' profits, and treble damages and attorney fees pursuant to 15 U.S.C.
4 § 1117(a)–(b). The amount of money due from Defendants to Amazon is unknown to Amazon
5 and cannot be ascertained without a detailed accounting by Defendants.

THIRD CAUSE OF ACTION

Trademark Dilution (15 U.S.C. § 1125(c))

8 115. Amazon incorporates by reference the factual allegations contained in Sections I–
9 IV as though set forth herein.

10 116. Amazon has exclusively and continuously promoted and used the Amazon
11 Trademarks. As one of the world's most well-known technology companies, the Amazon
12 Trademarks have become famous, distinctive, and well-known symbols of Amazon—well before
13 Defendants began using the Amazon Trademarks in association with their goods or services
14 unaffiliated with Amazon.

15 117. The actions of Defendants including, but not limited to, their unauthorized use of
16 the described Amazon Trademarks in commerce to deceive users into believing Defendants'
17 websites, apps, and services are affiliated with Amazon are likely to cause dilution of the
18 Amazon Trademarks by blurring and tarnishment in violation of 15 U.S.C. § 1125(c).

19 118. As a result of Defendants' willful conduct, Amazon is entitled to recover its actual
20 damages, Defendants' profits, and treble damages and attorney fees pursuant to 15 U.S.C. §
21 1117(a).

22 119. Amazon is further entitled to injunctive relief, as set forth in the Prayer for Relief
23 below. In addition to the significant harm that Defendants have caused to innocent customers,
24 Defendants' acts have caused irreparable injury to Amazon. The injury to Amazon is and
25 continues to be ongoing and irreparable. An award of monetary damages cannot fully
26 compensate Amazon for its injuries, and Amazon lacks an adequate remedy at law.

FOURTH CAUSE OF ACTION

Cybersquatting (15 U.S.C. § 1125(d))

120. Amazon incorporates by reference the factual allegations contained in Sections I–
3 IV as though set forth herein.

121. Amazon has exclusively and continuously promoted and used the Amazon
5 Trademarks. As one of the world’s most well-known technology companies, the Amazon
6 Trademarks have become famous, distinctive, and well-known symbols of Amazon—well before
7 any of the Defendants registered the domain echoalexaskill.com.

122. Defendants registered and used the domain echoalexaskill.com with a bad faith
9 intent to profit from the Amazon Trademarks based on a number of factors, including the fact
10 that the domain is used in furtherance of a scheme to defraud consumers by deceiving them into
11 believing Defendants’ domains are affiliated with Amazon.

123. The domain echoalexaskill.com is confusingly similar to or dilutive of the
13 Amazon Trademarks.

124. Amazon is entitled to actual damages under 15 U.S.C. § 1117(a), or in the
15 alternative, statutory damages under 15 U.S.C. § 1125(d)(1).

125. Amazon is entitled to have ownership of the domain echoalexaskill.com
17 transferred to it, or in the alternative to have this domain forfeited or cancelled.

126. Amazon is further entitled to injunctive relief, as set forth in the Prayer for Relief
19 below. In addition to the significant harm that Defendants have caused to innocent customers,
20 Defendants’ acts have caused irreparable injury to Amazon. The injury to Amazon is and
21 continues to be ongoing and irreparable. An award of monetary damages cannot fully
22 compensate Amazon for its injuries, and Amazon lacks an adequate remedy at law.

VI. PRAYER FOR RELIEF

24 WHEREFORE, Amazon respectfully prays for the following relief:

25 A. That the Court enter judgment in favor of Amazon on all claims;
26 B. That the Court issue an order permanently enjoining Defendants, their officers,

1 agents, representatives, employees, successors and assigns, and all others in active concert or
2 participation with them, from:

- 3 (i) Using the Amazon Trademarks in connection with any technology support
4 services, or sale of goods or services;
- 5 (ii) Registering domains that include, are confusingly similar to, or dilutive of,
6 the Amazon Trademarks;
- 7 (iii) Using any other indication of Amazon's brand in connection with any sale
8 of goods or technology support services;
- 9 (iv) Making any statement of an affiliation or connection to Amazon in
10 connection with any sale of goods or technology services; or
- 11 (v) Assisting, aiding, or abetting any other person or business entity in
12 engaging or performing any of the activities referred to in the
13 subparagraphs above;

14 C. That the Court enter an order requiring Defendants to provide Amazon a full and
15 complete accounting of all gross and net proceeds earned from innocent victims, including an
16 identification of those victims;

17 D. That Defendants' profits earned from innocent customers, as alleged in this
18 Complaint, be disgorged pursuant to 15 U.S.C. § 1117(a);

19 E. That Defendants be required to pay all actual damages which Amazon has
20 sustained, or will sustain, as a consequence of Defendants' unlawful acts, and that such damages
21 be trebled as provided for by 15 U.S.C. § 1117(a)–(b), or otherwise allowed by law;

22 F. That, instead of actual damages, Defendants be required to pay the maximum
23 amount of statutory damages for their infringement of the Amazon Trademarks pursuant to
24 15 U.S.C. § 1117(c);

25 G. As this is an exceptional case, that Defendants be required to pay the costs of this
26 action and the reasonable attorneys' fees incurred in prosecuting this action, as provided for by
27 15 U.S.C. § 1117, or otherwise by law; and

H. That the Court grant Amazon such other, further, and additional relief as the Court deems just and equitable.

DATED this 6th day of May, 2020.

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EXHIBIT A

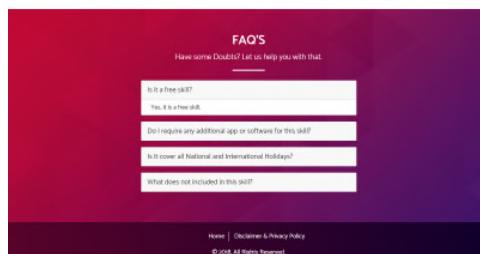
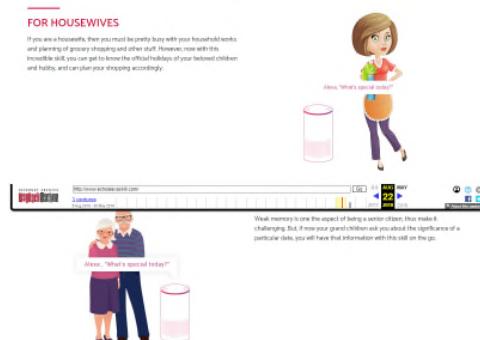
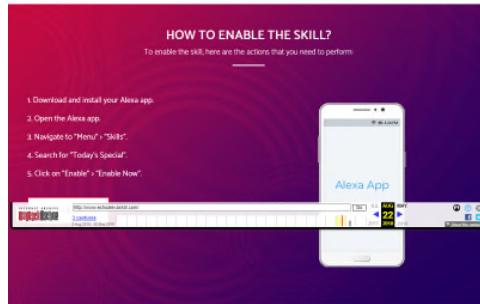
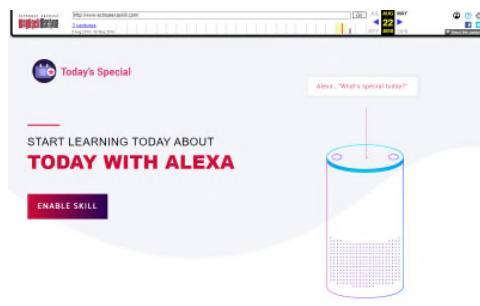


EXHIBIT B

- ▲ HOW DO AMAZON ECHO, ECHO PLUS, AND ECHO DOT RECOGNIZE THE WAKE WORD?
 The Voice-Recognition system in these devices helps them recognize and follow the wake word. Echo Dot, Echo Plus, and Amazon Echo leverage far-field voice recognition technologies to follow instructions and voice commands.
- ▲ DOES ECHO SUPPORT BLUETOOTH AND WI-FI CONNECTIVITY?
- ▲ HOW DO I USE ALEXA?
- ▲ I TURN OFF THE MICROPHONE ON AMAZON ECHO, ECHO PLUS, AND ECHO DOT?
- ▲ HOW DO AMAZON ECHO SHOW AND ECHO SPOT KNOW TO TURN ON THE SCREEN WHEN I WALK IN THE ROOM?
- ▲ DO I NEED THE ALEXA APP TO USE ECHO?
- ▲ CAN I CALL PHONE NUMBERS USING MY ECHO?
- ▲ HOW DO ALEXA SKILLS WORK?
- ▲ HOW DO I KNOW WHEN AMAZON ECHO SHOW IS STREAMING MY VOICE TO THE CLOUD?
- ▲ CAN I REVIEW WHAT I HAVE ASKED ALEXA?

Get to know about Amazon Devices

Get real-time answers including the latest on weather, traffic, finance, sports, local businesses and more.



Amazon Echo - Personal Assistant Smart Speaker

If you believe in innovation and connected operations, Amazon Echo will be the most awaited device for you. As a hands-free, voice-controlled speaker system, Echo can carry out operations with simple voice commands. Powered by Alexa, Amazon's very own AI assistant, listening to music and weather updates have become easier than ever. However, most of the users face problems while giving commands to the device. At times, Alexa doesn't seem to respond thus displaying the message 'template not found'. If you are facing such issues or other [problems with Amazon Echo](#), We will be right there to help you!

[Amazon Echo Support](#) technical expertise and efficiency is unmatched and we can deliver innovative solutions to clients.

More things you can ask 

Your Amazon Echo Not Working

Choose Your Country 

Select the Issue 

Enter Name Here *

Phone Number *

Preferred Time

Submit





Amazon Echo Dot - The Smartest of Them All

As a smart and innovative replica of Amazon Echo, the Echo Dot promotes 'Echo Spatial Perception' to a great extent. Leverage the device for listening to music, controlling smart devices, providing information, reading news, and setting alarms. You can also listen to your favorite playlist as the device connects with Pandora, Spotify, and Prime Music. However, it's not always this smooth. Echo Dot comes up with Bluetooth and [Wi-Fi connectivity issues](#) quite often.

Users find it difficult to connect with the device thus failing to play their favorite tracks! From [Set up issues](#) to connectivity problems, [Amazon Echo Dot support](#) can solve a gamut of problems linked to this smart device. We know how the 360-degree immersive sound works for the device and that's where we implement the right technical strategies to make it work. From analysis to complete solution, Amazon Echo Device Support will be there by your side.

[More things you can ask](#) 

Your Echo Dot Not Working

Choose Your Country	Select the Issue	Enter Name Here *	Phone Number *	Preferred Time	Submit
---------------------	------------------	-------------------	----------------	----------------	--------



Amazon Alexa Tap - Portable Smart Speaker

Another Alexa-enabled smart device that works on speech recognition. One of the prime benefits of using Alexa Tap is its exceptional, unique, and immersive sound technology. You can give commands and voice instructions from any corner of the house, and your virtual assistant will be right there to carry out the operations. But, how can give voice commands when there's a problem with the speakers. Alexa Tap comes up with speaker issues and that's quite often. Identification of the problem is the first thing to do. Check whether your Alexa Tap has problems with the default speakers or the inside ones. Does the audio sound inappropriate, fuzzy, muted, or tinny? Such problems create the demand for advanced [Amazon Echo Dot support](#). Even if it's in the middle of the night, we will be there for you!

[More things you can ask](#) 

Your Alexa Tap Not Working

Choose Your Country	Select the Issue	Enter Name Here *	Phone Number *	Preferred Time	Submit
---------------------	------------------	-------------------	----------------	----------------	--------





Amazon Echo Plus - Echo With Smart Hub

Amazon Echo Plus is latest and updated voice enabled Alexa speaker with in build smart home hub, it allow you to control many smart home device like smart lights, smart locks, smart gates, and security cameras from many popular brands like Philips Hue without any addition hub. If you are in market for amazon eco and want to control your device through voice than echo plus is one device that can do it for you with great efficiency. However some users reported that [setting up smart home is giving them trouble](#) and also there are many issues connecting echo plus with Alexa and Wi-Fi. If you are facing issues with amazon echo plus like [Music issue](#), connectivity issues, set up issues, amazon Alexa issues or issues setting up smart home devices just contact with [Amazon Echo Plus Support](#) team to get instant resolution of all you problems.

[More things you can ask](#)

Your Echo Plus Not Working



Amazon Echo Show - Adds Sight to The Sound

With a smart appearance, a classic 7-inch display, and unique voice-calling features, the Echo Show happens to be the fourth installment of the Amazon Echo Series. Going by its market demands and user feedback, Echo Show ranks amongst the top-rated AI-integrated devices. With far-field voice recognition at its core, Echo Show performs a multitude of activities with a single voice command. The [most common Amazon Echo Show problem](#) is with the performance of this device. Users might give a command and ask the device to play a video or audio clip. At times, Alexa seems to be following the command but the search result pops up as 'template not found'. Such situations might disturb users but we will be there to render comprehensive support. Get in touch with [Amazon Echo Show support](#) for complete tech support, no matter how serious the problem!

[More things you can ask](#)

Your Echo Show Not Working

Site Links

- [Home](#)
- [About Us](#)
- [Contact Us](#)
- [Blog](#)
- [FAQs](#)
- [Disclaimer](#)
- [Privacy Policy](#)
- [Terms and Conditions](#)

Support Links

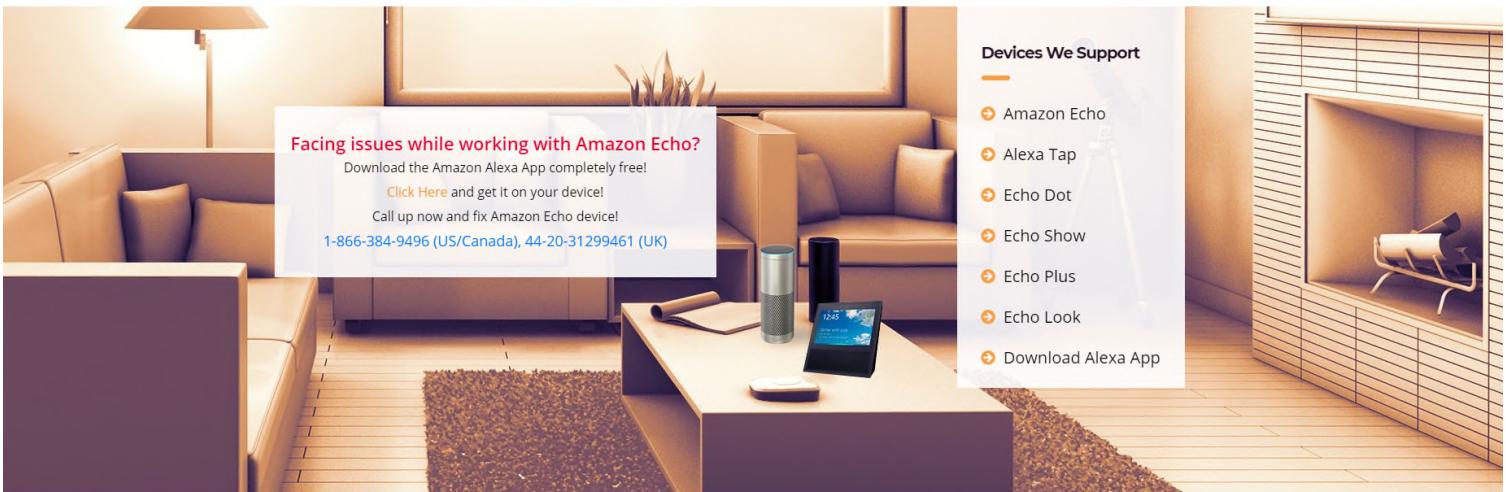
- [Amazon Echo](#)
- [Echo Dot](#)
- [Alexa Tap](#)
- [Echo Plus](#)
- [Echo Show](#)
- [Echo Connect](#)
- [Fire TV Stick](#)
- [Echo Setup & Troubleshoot](#)
- [Download Alexa App](#)

Contact Us

support@echoalexasupport.com
 US/Canada- 1-888-299-7571
UK- 44-20-80775546



EXHIBIT C



Devices We Support

- Amazon Echo
- Alexa Tap
- Echo Dot
- Echo Show
- Echo Plus
- Echo Look
- Download Alexa App

Echo Help - Devices We Support

Now Providing Support For Echo Plus And Echo Look



Amazon Echo

Finding it difficult to set up the Amazon Echo device or having trouble with Wi-Fi/Bluetooth Connectivity? Echo Help is here with a range of unique setup solutions.

[Read More >](#)



Alexa Tap

A high-performance Bluetooth speaker with exceptional functionalities! In case there's a problem with the Amazon Alexa tap, Echo Help will provide the best [Amazon Alexa tap support](#).

[Read More >](#)



Echo Show

Facing Trouble watching movies, connecting the security camera to echo show or finding it difficult to check out the built-in ads? Echo Help at [Amazon Echo Show support](#) will help you do that!

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Echo Plus

Planning to build a smart and connected home with Amazon Echo Plus but facing critical problems? Not to worry as long as the [echo plus support customer](#) service number is with you!

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Echo Look

Build your own personal look book using just your voice. In case you are not able to save a style or delete a style or facing setup up or connectivity issues, give [echo show support](#) a call and we will fix all the issues.

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Echo Dot

Facing trouble connecting and setting up amazon echo dot or Alexa is not able to communicate with your Amazon Echo Dot or any other issues; [Echo Dot Support team](#) is always here to help you out.

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Opt For The Solution That Best Fits Your Requirements - Echo Help

No Matter What The Issue And Time, We Will Solve Your Alexa Echo Problems Every Time You Refer To Us!

1. Problems With Wi-Fi Connections? We Will Come Up With Echo Help & Support For You!

Are you completely bogged down by problems in [Amazon](#) Echo Wi-Fi? As the most reliable and trusted support team, Echo Help will incorporate the best strategies for your device. Echo Help can fix the problems instantly, securely, and remotely.

There are high possibilities of your Echo device showing errors while getting connected to Wi-Fi. Many individuals face such hassles, and there's no point in thinking that you are alone!

There are high possibilities of your Echo device showing errors while getting connected to Wi-Fi. Many individuals face such hassles, and there's no point in thinking that you are alone!

At the same time Alexa keeps getting disconnected from a network or can't identify the Wi-Fi connection, it's high time to check device authentication. Such signs indicate towards network security or Alexa app issues. Do you have our amazon echo contact number? Probably you do have, give us a call, and the issue

2. Problems While Setting Up Amazon Echo Alexa? Here We Come With Unmatched Setup Support!

So, you finally got your Amazon Echo?! That's great news indeed! Don't go by the size, with innumerable features packed in it; this particular device is no less than innovation.

Since you've got your hands on it, you can perform a gamut of operations now! Keep a tab on the security camera, order your favorite pizza, call Uber, and control your smart home devices!

However, setting up the Echo device is important before anything else. That's where you need professional amazon Echo Help! Just call up the numbers given on the screen, and we will do the needful for you!

Experience is a prime factor in such projects as it plays the pivotal role in fixing these devices. With a team of proficient experts and unique tech resources, we will make sure your device is set up in the right way.

3. Alexa Fails To Find The Connected Devices: Exceptional Smart Home Support By Alexa Echo Team

With simple voice commands and verbal instructions, you can control your home devices and appliances.

Switch off the light, turn off security cameras, or open the main gate, Alexa can help you perform all these actions within minutes. All you need to do is setup Alexa in the right way so that it identifies the location of your smart home devices.

If this process seems to be overwhelming, we at Amazon Echo Help will be right there to help you!

Let us take charge and integrate your smart home devices including smartphone, security camera printer, TV, tablet, and Bluetooth-enabled equipment.

No matter what type of device you have, we will lend appropriate technical support. Irrespective of the device and its features, we will make sure it works perfectly!

Our team (Echo Help) will work without asking any question. You might have plenty of devices to connect with, and we will make sure that happens! Just tell us the number of smart home devices and our team can take the responsibility of integrating them!

4. Facing Crucial Hassles While Streaming Music, Audio-Books With The Help Of Your Alexa Device?! Rely On Us For The Best Echo Music Support!

Echo is known for its capability to stream live media and music from various sources including Tune In, iHeartRadio, Pandora, and Spotify.

However, intermittent and undesired performances can create a lot of troubles. These issues can pop up for quite a few reasons.

It might be problems with the speakers or connectivity issues with the Wi-Fi. Irrespective of the problem, Echo Help will be right there to solve it and resolve streaming issues that include:

Issues while syncing Spotify to Amazon Echo

Problems related to Amazon prime music

[Downloading Alexa App](#)

Sudden issues while playing audio tracks

Alexa failing to identify music sources and inability to play it

Amazon Echo and Pandora issues

And lots more!

5. Bluetooth Connectivity Errors (Problems With Bluetooth Support)

If you are finding it difficult to pair the device with Bluetooth, you will also face problems while pairing it with Echo Plus, Show, Dot, or Tap.

You can try out the 'un-pairing' and 're-pairing' options at the beginning. In case that fails to work, click the 'fix issue now' button or simply give us a call! Our experts will be right there to solve the problems within the shortest time span!

Have you found the issue listed above? No? Connect with us virtually for extended technical support. Visit our website, and we can also engage in online chat and discussions.

Give Us A Quick Buzz In Our Toll-Free Help Numbers!
1-866-384-9496 (US/Canada), 44-20-31299461 (UK)

We Are Distinctive...And We Feel Proud For That!

Identification, Diagnosis, And Troubleshooting Define Our Services. We Love To Learn, Educate, And Solve Technical Issues Through Collaborative Sharing!

From playing your favorite tracks to keeping a tab on the news, your Amazon Echo device can perform a gamut of operations.

However, functional hassles can lead to critical errors thus leaving you frustrated. That's when you need the right tech support by your side. Professional support for your amazon echo phone is essential. Right from the set up to performance, it is imperative to follow perfect and appropriate tips.

From troubleshooting the elementary issues to solving critical technical problems, our team of experts can render customized support. We specialize in a range of technical solutions and can render professional support to clients across the globe.

We are known for our distinctive services and unsurpassed values. Here's what we have in the kitty for esteemed clients:

1. One-Time Setup

We will render the best amazon echo customer support in setting up the device and ensuring its superior performance. Charges are highly affordable, and you won't have to lose your mind over setup issues!

2. Remote Assistance

Are you placed in a different location? With the best echo tech support services by your side, you won't have to worry about technical help. Our team can reach out to various clients across US and UK thus offering remote support.

3. Money-Back Guarantee

We pride on our service and make it our client that always we will be there to you. We offer many different ways to find and run your business and you can also claim the money invested in support services. Nothing is more important to us than clients, and we will go any length to satisfy them through our Amazon Echo contact number.

4. Excellent Customer Service

Are you stuck in the middle of an issue, and is that in the middle of the night? Just dial the Amazon Echo help number and our experts will be right there to help you!



Latest Articles

At Amazon Tech Support, we pride on our expertise and in-depth market experience. As a reputed 3rd party service provider, we can extend comprehensive support to clients. You can have discussions with your vendor about warranty periods and service clauses. We will always aim at providing comprehensive support, and that's what we are famous for! No matter what the issue, our Amazon Echo customer service phone number will prove to be the savior! Get in touch with us today, for the best Amazon Echo tech support!

[Why Is Apple's HomePod 3 Years Behind The Amazon Echo?](#)

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